

1 T. LOUIS PALAZZO, ESQUIRE
2 Nevada Bar No. 4128
3 PALAZZO LAW FIRM
4 A PROFESSIONAL LAW CORPORATION
5 520 South Fourth Street, Second Floor
6 Las Vegas, Nevada 89101
7 Telephone: (702) 385-3850
8 Fax: (702) 385-3856

9 NATHAN F. GARRETT
10 *pro hac vice*
11 LUCINDA H. LUETKEMEYER
12 *pro hac vice*
13 GRAVES GARRETT GREIM LLC
14 1100 Main Street, Suite 2700
15 Kansas City, Missouri 64105
16 Telephone: (816) 256-3181
17 Fax: (816) 256-5958

18 *Attorneys for Defendant*
19 *Michael Halprin*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 UNITED STATES OF AMERICA,
23
24 Plaintiff,

25 vs.

26 MICHAEL HALPRIN,
27
28 Defendant.

Case No.: 2:19-cr-00154-RFB-MDC

**JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR
SEPTEMBER 5, 2024**

29 IT IS HEREBY STIPULATED AND AGREED by and between JASON FRIERSON,
30 United States Attorney, District of Nevada, and NADIA AHMED and JACOB OPERSKALSKI,
31 Assistant United States Attorneys, representing the United States of America, and LOUIS
32 PALAZZO, NATHAN GARRETT, and LUCINDA LUETKEMEYER, representing Defendant
33 Michael Halprin, that the sentencing hearing scheduled for September 5, 2024, at 9:15 a.m., in the

1 above-captioned matter, be vacated and continued to a date and time to be set by this Honorable
2 Court but no sooner than January 6, 2025.

3 This stipulation is entered into for the following reasons:

4 1. Sentencing in this matter is currently scheduled for September 5, 2024, at 9:15 a.m.

5 2. On July 2, 2024, counsel for co-defendant Eghomware Igbinovia, aka Jerry Igbinovia,
6 and the government jointly moved to continue the calendar call and trial date. The calendar call
7 is now scheduled for December 10, 2024, and trial is now scheduled for January 6, 2025. Dkt.
8 No. 400.

9 3. Defense counsel needs additional time to investigate issues relevant to sentencing and
10 prepare for sentencing.

11 4. Mr. Halprin has appeared in this case, and is not in custody and, along with the
12 government, agrees to this continuance.

13 5. The additional time requested herein is not sought for purposes of delay and the denial of
14 this request for a continuance could result in a miscarriage of justice.

15 6. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing
16 hearing for good cause. Good cause exists in this case.

17 7. Counsel for Defendant Michael Halprin and the government agree a continuance of the
18 sentencing hearing is in the best interests of justice.

19 8. For all the above-stated reasons, the ends of justice would be best served by the
20 continuance of the sentencing hearing.

21 This is the eighth request for a continuance of the sentencing hearing.
22
23
24
25
26
27
28

1 DATED: July 8, 2024

2 /s/ Nathan F. Garrett

3 GRAVES GARRETT GREIM LLC

4 Nathan F. Garrett, *pro hac vice*

5 Lucinda H. Luetkemeyer, *pro hac vice*

6 PALAZZO LAW FIRM

7 A PROFESSIONAL LAW CORPORATION

8 T. Louis Palazzo, Esquire

9 *Counsel for Defendant Michael Halprin*

10 JASON FRIERSON

11 United States Attorney

12 By /s/ Jacob Opskalski

13 Jacob Opskalski

14 Assistant United States Attorney

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL HALPRIN,

Defendant.

Case No.: 2:19-cr-00154-RFB-MDC

**JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR
SEPTEMBER 5, 2024**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Sentencing in this matter is currently scheduled for September 5, 2024, at 9:15 a.m.
2. Defense counsel needs additional time to investigate issues relevant to sentencing and prepare for sentencing.
3. Mr. Halprin has appeared in this case, and is not in custody and, along with the government, agrees to this continuance.
4. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.
5. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing hearing for good cause. Good cause exists in this case.

For all of the above-stated reasons, the ends of justice would best be served by an order vacating the current sentencing hearing date and continuing the sentencing hearing date no sooner than January 6, 2025.

ORDER

IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for September 5, 2024, at the hour of 9:15 a.m., be vacated and continued to 1/14/2025 at 9:15 a.m.

Dated 7/10/2024

A handwritten signature in black ink, consisting of a stylized 'R' and 'B' intertwined.

THE HONORABLE RICHARD F. BOULWARE
UNITED STATES DISTRICT JUDGE